EXHIBIT L

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: *Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.*	 15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF JUAN RAMIREZ

I, Juan Ramirez, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at 3 World Trade Center when the terrorist attacks of the World Trade Center Towers occurred.

4. I worked at Marriott World Trade Center at 3 World Trade Center at the time of the 9-11 attacks, and I was an employee of Marriot Incorporated at that time.

5. I was in New York City at Ground Zero when the plane(s) hit the towers and I received physical injuries in the escape and collapse. I was working inside Marriot World Trade

Center, next to the Greenhouse Restaurant, when the passenger jet struck the first tower. I was setting up a convention room at the time of the impact.

6. I heard a loud "boom" and the building shook. I went over to the window where I saw pieces of concrete debris falling all around the hotel. Soon people began screaming and running in various directions. I was running with one of my co-workers, Dennis. People were falling on the stairs and I fell too. When I got to the lobby, I saw security guards pointing guests towards an exit. When I exited the hotel, I began to panic. I ran across an open area, initially hoping to make it to the ferries. I saw a huge hole in Tower 1 and someone pointed out the wing of a plane on the floor of Tower 1. When I saw that a plane had hit the tower, I did not initially realize at that time that terrorists had intentionally flown into the building. About fifteen minutes later, I heard another plane overhead and I looked up and watched it hit Tower 2. At that point, I realized that this was an act of terrorism and I became angry.

I watched in horror as people began jumping out of the towers to their deaths. As people ran away from the towers, the crowd trampled me as people fled for their lives. I was able to get back to my feet, and Dennis and I went back to the Marriott to try to help our co-workers escape. However, police officers in the area would not allow us to reenter the building as they began to seal off the area. As I was standing there in front of the Marriott, the tower in front of me began to collapse. I thought I was going to die. I started running away from the area again, and I fell in the confusion of people rushing to get away. After the collapse, everything went black and I heard people screaming. A firefighter grabbed me and other people who had fallen and he escorted us away from the area and down to Battery Park. I boarded a boat at that time, and I was later taken to a St. Francis Hospital in Jersey City, New Jersey. At St. Francis, I stayed overnight while receiving care for my injuries. I then left the hospital the following day. I have further attached

herein as Exhibit B to this Declaration a true and correct copy of my prior Affidavit that I submitted on October 25, 2002, in state court in New York related to my experiences and injuries sustained on 9-11.

7. Because of these 9-11 terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: a fractured left scapula, a sprained left elbow, and a torn left rotator cuff.

8. I sought medical attention for my physical injuries as is detailed in my medical records. I underwent arthroscopy, decompression and repair surgery for the tear in my rotator cuff on October 23, 2001. I stayed in the hospital for three days while recovering from the surgery. Thereafter, I continued to require physical therapy and I was unable to perform the type of work I had previously performed. My injuries still cause pain to this day. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

9. I also suffered and continue to suffer from emotional distress and PTSD because of the atrocities that I witnessed on 9-11. Shortly after 9-11, I underwent extensive psychotherapy and I was treated once per week by a psychiatrist for my PTSD condition. During the events of 9-11, I saw people jumping to their deaths. During my escape from Ground Zero, I saw body parts and I witnessed other unspeakable events. I still have flashbacks of the scenes from 9-11, and I continue to experience bouts of anger and anxiousness as a result.

Using public transportation became very stressful for me after 9-11 because of my need to remain vigilant about my fear of terrorism. I did not feel like I could protect myself in public, and my condition progressed to the point at which I feared even leaving my house. In 2005, I decided that I could no longer stay in New York City due to my PTSD, and I finally moved to Apopka,

Florida, in 2006 to get away from my memories of 9-11. I have not been back to the state of New York since 2006 due to my PTSD, and despite the fact that many of my family members still live there.

10. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks. Exhibit C also contains select relevant records related to my past and present treatment for severe emotional distress/PTSD.

11. I previously pursued a claim (VCF I Claim Number 212-002323) through the September 11th Victim Compensation Fund (VCF) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation. Attached as Exhibit D to this Declaration is a true and correct copy of my Eligibility & Award Decision letter of April 26, 2004, from the VCF.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 29 day of January 2020

Signature of Affiant, Juan Ramirez

Exhibits Filed Under Seal